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Attorney for Defendants
Executive Realty Services, Inc.
and Donald Edward Klein

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LISA CORSON,

Plaintiff,

v.

EXECUTIVE REALTY SERVICES, INC.
and DONALD EDWARD KLEIN,

Defendants.

Case No. 2:22-cv-01292-RFB-BNW

**PARTIES' STIPULATION TO EXTEND
DEADLINE FOR PLAINTIFF TO FILE A
MOTION TO STRIKE DEFENDANTS'
AFFIRMATIVE DEFENSES OR
DEFENDANTS TO FILE AN AMENDED
ANSWER**

(First Request)

**PARTIES' STIPULATION TO EXTEND DEADLINE FOR PLAINTIFF TO FILE A
MOTION TO STRIKE DEFENDANTS' AFFIRMATIVE DEFENSES OR DEFENDANTS
TO FILE AN AMENDED ANSWER**

Pursuant to LR IA 6-2 and LR 7-1, Plaintiff Lisa Corson ("Corson") and Defendants Executive Realty Services, Inc. and Donald Edward Klein (collectively "Defendants"), by and through their undersigned counsel, hereby stipulate and agree to extend the date by which Plaintiff may file a motion to strike affirmative defenses or Defendants to Amend their Answer from December 23, 2022 to January 23, 2023. This is the first such request for an extension of time. In support thereof, the Parties state as follows:

1. Corson filed her Complaint on August 11, 2022 at ECF No. 1;
2. Defendants filed their Answer on December 2, 2022 at ECF No. 15;
3. Plaintiff's motion to strike affirmative defenses deadline is December 23, 2022 (*see* Fed. R. Civ. P. 12(f)(2));
4. Defendants' deadline to Amend its Answer is December 23, 2022 (*see* Fed. R. Civ. P. 15(a)(1)(A));
5. Plaintiff sent a letter to Defendants' requesting a meet and confer to discuss the affirmative defenses;
6. Defendants' Answer to Corson's Complaint contains 23 Affirmative Defenses;
7. Counsel for the parties require additional time in which to confer regarding Defendants' Affirmative Defenses as the Parties look towards early resolution of this matter;
8. Because of the Holidays, Counsel for both Parties will be unable to meet and confer regarding Affirmative Defenses until December 27, 2022;
9. Parties are actively making progress towards early settlement and resolution of this matter;
10. The Parties believe that extending Plaintiff's time to file its motion to strike affirmative defenses will conserve resources;
11. Parties request an additional 30 days in which to file a motion to strike affirmative defenses or amended answer, if needed, up to and including January 23, 2023;

12. Defendants' counsel does not object to continuing the deadlines;

13. This request is not made for delay; and

14. This will not delay or have any effect on the schedule in this case.

Accordingly,

IT IS STIPULATED that Plaintiff's deadline to file a motion to strike affirmative defenses and for Defendant to Amend their Answer is hereby continued from December 23, 2022 to January 23, 2023.

DATED: December 16, 2022

Respectfully submitted,

/s/ Trey A. Rothell

MARC J. RANDAZZA

TREY A. ROTHELL

RANDAZZA LEGAL GROUP, PLLC

Attorneys for Plaintiff Lisa Corson

/s/ Taylor Simpson

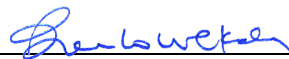
TAYLOR SIMPSON

STERLING KERR

**KERR SIMPSON ATTORNEYS AT
LAW**

Attorneys for Defendants Executive Realty
Services, Inc. and Donald Edward Klein

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: December 19, 2022